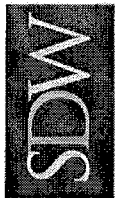


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LR IA 10-2 within 45 days)

Attorneys for Defendant Qnective, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PAGEANT HOLDINGS, LTD, a Bailiwick of
Jersey (aka the Channel Islands) Corporation,

Plaintiff,

vs.

QNECTIVE, INC., a Nevada Corporation,

Defendant.

CASE NO.:

DEFENDANT'S NOTICE OF REMOVAL

TO: THE CLERK OF THE ABOVE-ENTITLED COURT; and

TO: PLAINTIFF and its counsel of record:

Pursuant to 28 U.S.C. § 1332, 28 U.S.C. § 1441, and 28 U.S.C. § 1446, Defendant

QNECTIVE, INC. ("Defendant"), hereby removes the above-referenced action from the Eighth Judicial District Court located in Clark County, Nevada, to this Court on the grounds that this Court has original jurisdiction over this civil action as authorized under 28 U.S.C. § 1332. In support of the removal of this action to federal court, Defendant makes the following short and plain statement in accordance with 28 U.S.C. § 1446.

1. On February 18, 2011, PAGEANT HOLDINGS, LTD ("Plaintiff") commenced this action by filing an action against Defendant in the Eighth Judicial District Court located in Clark County, Nevada. Attached hereto as **Exhibit A** is a copy of the Complaint.

2. Plaintiff served a Summons and copy of the Complaint on Defendant on February 18, 2011. Attached hereto as **Exhibit B** is a copy of the relevant documentation memorializing service of process.

3. The case is designated as Case No. A-11-635468-B in the Eighth Judicial District Court for the County of Clark, State of Nevada, under the caption Pageant Holdings, Ltd v. Qnective, Inc.

4. The Action is one which the Defendant is entitled to remove given that this is a matter between citizens of different states, and the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs. As set forth in more detail below, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332.

5. This is a matter between citizens of different states. Defendant QNECTIVE, INC. is a dissolved Nevada corporation, with its principal place of business in the country of Switzerland. Plaintiff PAGEANT HOLDINGS, LTD, is a Bailiwick of Jersey (aka the Channel Islands) Corporation, with its principal place of business in the country of Ireland.

6. The amount in controversy exceeds \$75,000.00, exclusive of interest and costs, as it is alleged by Plaintiff in the Complaint that they are entitled to a fair value of their shares in QNECTIVE, INC., which "would be no less than \$6,500,000.00." Ex. A, ¶ 23.

7. Other than the filing of the Complaint, there has been no other action taken in the Eighth Judicial District Court, Clark County, Nevada.

8. Venue is proper in this District.

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9. This Notice of Removal is timely filed within thirty days after the receipt by the Defendant through service of a copy of the initial pleadings setting forth the claim for relief upon which such action or proceeding is based. 28 U.S.C. § 1446(b).

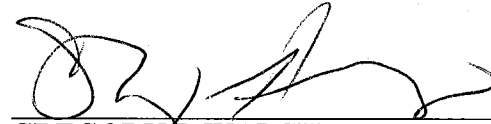
10. Written notice of this Notice of Removal will be given to the adverse parties, and a copy of this Notice of Removal will be filed with the Clerk of the Eighth Judicial District Court in and for Clark County of Nevada. 28 U.S.C. § 1446(d).

11. This Notice of Removal is signed pursuant to Rule 11 of the Federal Rules of Civil Procedure.

WHEREFORE, Defendant hereby gives notice that Case No. A-11-635468-B, which is now pending against it in the Eighth Judicial District Court of the State of Nevada, in and for Clark County, has been removed to this Court.

DATED this 18th day of March, 2011.

**SANTORO, DRIGGS, WALCH,
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SDW

CERTIFICATE OF SERVICE

The undersigned, an employee of SANTORO, DRIGGS, WALCH, KEARNEY, HOLLEY & THOMPSON, hereby certified that on the 18th day of March, 2011, she served a true and correct copy of the foregoing, **DEFENDANT'S NOTICE OF REMOVAL**, by:

 X Notice of Electronic Filing
addressed as follows:

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/s/ Natasha Dalton

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